

RECEIVED

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS

MAY 11 2005

PATTERSON, THUENTE, SKA
& CHRISTENSEN, P.A.

DONALD C. HUTCHINS,

Plaintiff,

Civil Action No. 04-30126-MAP

v.

CARDIAC SCIENCE, INC.,

Defendant.

AFFIDAVIT OF RODERICK DE GREEF

I, Roderick de Greef, declare under penalty of perjury that the following is true and correct to the best of my knowledge, information and belief:

1. I have been Cardiac Science's Executive Vice President, Chief Financial Officer and Secretary since March 2001.
2. Exhibit A to this affidavit is a true and correct copy of the April 14, 2005 letter and its attachments, including a replacement royalty check, a copy of the original check issued and Cardiac Science's bank activity reports, sent from Cardiac Science to Donald Hutchins.
3. Check number 34634 in the amount of \$1990.38 dated June 10, 2004 was sent to Donald Hutchins for royalties due in compliance with the June 1, 1994 License Agreement for the second and third quarters of Cardiac Science's 2003-2004 fiscal year.
4. On March 17, 2005 check number 34634 was cashed and cleared Cardiac Science's bank. On March 21, 2005 Cardiac Science was notified that the check was credited back due to the stale date of the check.



5. On April 14, 2005 replacement check number 40736 in the amount of \$1990.38 was sent to Donald Hutchins.

6. On April 21, 2005 check number 40736 was cashed and cleared Cardiac Science's bank.

7. To the best of my knowledge Cardiac Science has performed all its obligations under the June 1, 1994 License Agreement.

FURTHER YOUR AFFIANT SAYETH NOT.



A handwritten signature "Roderick de Greet" is written over a horizontal line, which is itself crossed out by a large, thin-lined "X".

Subscribed and sworn to before me
this 10th day of May, 2005

A handwritten signature "Susan L. Hawks" is written over a horizontal line.

Notary Public



CARDIAC SCIENCE

April 14, 2005

Don Hutchins
CPR Prompt Corporation
1047 Longmeadow St.
Longmeadow, MA 01106

Dear Mr. Hutchins:

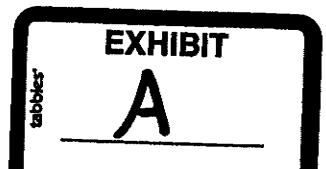
Enclosed please find a replacement check in the amount of \$1,990.38 to replace check number 34634 dated 6/10/04 that you recently tried to cash. Our bank records show that the check was cashed and cleared our bank on 3/17/05, but was then credited back to us on 3/21/05 due to a stale date issue. Since our bank did not honor the check, we assume your account was also charged back for the amount after you deposited the check, therefore, we are reissuing this new check.

If you have any questions, please call me at 949-797-3898.

Sincerely,

A handwritten signature in black ink, appearing to read "Sally Goff".

Sally Goff
Vice President, Finance



CARDIAC SCIENCE, INC.

40736

11389	CPR PROMPT CORPORATION	00044646	4/15/2005				
Voucher Number	Invoice Number	Inv. Date	Invoice Amount	Amount Paid	Discounts	Net Amount	
0039416	2003/2004 Q3	6/1/2004	\$1,327.66	\$1,327.66	\$0.00	\$0.00	\$1,327.66
0039417	2003/2004 Q2	6/1/2004	\$662.72	\$662.72	\$0.00	\$0.00	\$662.72

\$1,990.38	\$1,990.38	\$0.00	\$0.00	\$1,990.38
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THIS DOCUMENT HAS A SECURITY CODE PRINTED ON THE BACK. DOCUMENT IS SECURE IF DOCUMENT IS SECURITY SCREEN ON BACK WITH PADLOCK SECURE ETC.



CARDIAC SCIENCE
1900 Main Street, Suite 700
Irvine, CA 92614

Silicon Valley Bank
In Cooperation with Mellon Bank, N.A.
Pittsburgh, PA

60-160
433

40736

4/15/2005

DATE _____

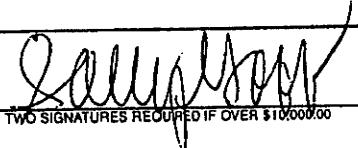
\$1,990.38

AMOUNT

One Thousand Nine Hundred Ninety 38

PAY
TO THE
ORDER
OF

CPR PROMPT CORPORATION
ATTN: DON HUTCHINS
1047 LONGMEADOW STREET
LONGMEADOW MA 01016


TWO SIGNATURES REQUIRED IF OVER \$100,000.00
MP

10407361043301601100402024

MP

MP

CARDIAC SCIENCE, INC.

11389	CPR PROMPT COPORATION	00038368	6/10/2004	Inv. Date	Invoice Amount	Amount Paid	Discounts	Net Amount
Voucher Number	Invoice Number			6/1/2004	\$1,327.66	\$1,327.66	\$0.00	\$0.00
0039416	2003/2004 Q3			6/1/2004	\$662.72	\$662.72	\$0.00	\$662.72
0039417	2003/2004 Q2							

*Original
Check*

\$1,990.38	\$1,990.38	\$0.00	\$0.00	\$1,990.38
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THIS DOCUMENT HAS A SECURITY COLOR BACKGROUND ON FACE AND ORIGINAL DOCUMENT SECURITY SCREEN ON BACK WITH PADLOCK SECURITY CODE.



CARDIAC SCIENCE
1900 Main Street, Suite 700
Irvine, CA 92614

Silicon Valley Bank
In Cooperation with Mellon Bank, N.A.
Pittsburgh, PA
60-180
433

34634

6/10/2004

DATE _____
AMOUNT \$1,990.38

JUN 11 2004

PAY
TO THE
ORDER
OF
CPR PROMPT COPORATION
81 MACK AVENUE
TORONTO, ONTARIO
CANADA M1L 1M8 *

[Signature]

MP

TWO SIGNATURES REQUIRED IF OVER \$10,000.00

MP

1047 Longmeadow St.
Longmeadow MA 01106

MP

CARDIAC SCIENCE, INC.

34634

11389	CPR PROMPT COPORATION	00038368	6/10/2004	Inv. Date	Invoice Amount	Amount Paid	Discounts	Net Amount
Voucher Number	Invoice Number			6/1/2004	\$1,327.66	\$1,327.66	\$0.00	\$1,327.66
0039416	2003/2004 Q3			6/1/2004	\$662.72	\$662.72	\$0.00	\$662.72
0039417	2003/2004 Q2							

\$1,990.38	\$1,990.38	\$0.00	\$0.00	\$1,990.38
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As of 03/16/05
 Generated on April 14 2005 04/14/05 16:17:21

Bank: Silicon Valley Bank
 Account: 0600224270 - CARDIAC SCIENCE INC (USD)

Detail Debit Transactions	Amount	Bank Ref.	Customer Ref.	Text
Controlled Disbursement Check	\$50.00	42024	39781	
Controlled Disbursement Check	\$200.05	42024	39631	
Controlled Disbursement Check	\$300.00	42024	39808	
Controlled Disbursement Check	\$360.00	42024	39329	
Controlled Disbursement Check	\$450.00	42024	39866	
Controlled Disbursement Check	\$839.44	42024	39843	
Controlled Disbursement Check	\$3,200.00	42024	39716	
Controlled Disbursement Check	\$7,419.50	42024	39838	
Controlled Disbursement Check	\$9,072.50	42024	39833	
Controlled Disbursement Check	\$22,835.61	42024	39754	
Controlled Disbursement Check	\$35,616.00	42024	39791	
Controlled Disbursement Check	\$36,632.73	42024	39895	

CARDIAC SCIENCE
Same Day Balance Report
As of 03/17/05
 Generated on April 14 2005 04/14/05 16:17:21

Bank: Silicon Valley Bank
 Account: 0600224270 - CARDIAC SCIENCE INC (USD)

Detail Debit Transactions	Amount	Bank Ref.	Customer Ref.	Text
Controlled Disbursement Check	\$4.32	42024	39639	
Controlled Disbursement Check	\$35.00	42024	39970	
Controlled Disbursement Check	\$50.00	42024	39948	
Controlled Disbursement Check	\$123.08	42024	39987	
Controlled Disbursement Check	\$331.84	42024	39941	
Controlled Disbursement Check	\$387.50	42024	39957	
Controlled Disbursement Check	\$442.21	42024	39939	
Controlled Disbursement Check	\$1,990.38	42024	34634	
Controlled Disbursement Check	\$2,326.66	42024	39925	
Controlled Disbursement Check	\$3,154.60	42024	39910	
Controlled Disbursement Check	\$3,596.00	42024	39961	
Controlled Disbursement Check	\$6,311.45	42024	39966	
Controlled Disbursement Check	\$10,620.19	42024	39790	
Controlled Disbursement Check	\$39,799.07	42024	39883	
Controlled Disbursement Check	\$41,128.00	42024	39965	

CARDIAC SCIENCE

03/21/2005				
Deposit	\$69,170.84	0000061	LOCKBOX DEPOSIT	<i>needs to post 2/27/05</i>
03/21/2005 Wire Transfer Credit	\$10,327.45	0000222	WIRE IN 050321L4B74G2C000524,200508000113;ORG BIANUCCI DI BIANUCCI S. E C. SN	
03/21/2005 Wire Transfer Credit	\$12,164.65	0000646	WIRE IN 050321B1Q8154C001216,200508000358;ORG RIGHETTO SNC APPARATI SCIENTIFIC	
03/21/2005 Miscellaneous Credit	\$1,491.89	0001410	CONV GBP 799.00 @ 1.8672/ESSEX,AMBULANCE SERVICES 0	
03/21/2005 Miscellaneous Credit	\$1,990.38	0000230	CTR 3/18/2005 DIS CK34634 REV,3/17 STALE DATED 0	
03/22/2005 ACH Credit	\$3,631.42	0001340	MERCHANT SERVICE MERCH DEP	
03/22/2005 Deposit	\$3,556.22	0437015		
03/22/2005 Deposit	\$4,860.45	0437309		
03/22/2005 Deposit	\$300,591.43	0000051	LOCKBOX DEPOSIT	
03/22/2005 Wire Transfer Credit	\$14,964.98	0000456	WIRE IN 050322B6B7001C002641,200508100233;ORG PHARMANIAGA B IOMEDICAL SDN BHD;	
03/22/2005 Wire Transfer Credit	\$18,451.12	0000248	WIRE IN 050322B1Q8984C000104,200508100128;ORG LA MAISON DE LA PISCINE;OBI INVO	
03/22/2005 Wire Transfer Credit	\$4,838.60	0002170	FX 290043,EUR3722.00 1.300000	
03/22/2005 Wire Transfer Credit	\$14,329.08	0002280	FX 290069,EUR11022.37 1.300000	
03/23/2005 ACH Credit	\$2,339.49	0001333	MERCHANT SERVICE MERCH DEP	
03/23/2005 Deposit	\$5,648.40	0289527		
03/23/2005 Deposit	\$126,813.15	0000033	LOCKBOX DEPOSIT	
03/23/2005 Wire Transfer Credit	\$1,044.28	0000690	WIRE IN 050323B1Q8984C000902,200508200395;ORG PACIFIC MEDICAL SYSTEMS LIMITED	
03/23/2005 Wire Transfer Credit	\$2,841.50	0000736	WIRE IN 050323B1Q8151C001681,200508200418;ORG UTAMA ASSOCIATES SDN BHD	
03/23/2005 Wire Transfer Credit	\$9,683.42	0000458	WIRE IN 050323B1Q8984C000461,200508200237;ORG TECHNOLINE LTD;OBI INV:540076	
03/23/2005 Wire Transfer Credit	\$12,965.90	0000020	WIRE IN 050323B6B7HU3R000028,200508200013;ORG NORTEMA AS;OBI INVOICE 540593 /	
03/23/2005 Wire Transfer Credit	\$52,794.50	0000202	WIRE IN 050323B6B7HU8R000159,200508200104;ORG BEIJING SANJIU KANGRUN TRADING;	
03/24/2005 ACH Credit	\$546.50	0000019	SC0200 MEDICAL FEDINVOICE	
03/24/2005 ACH Credit	\$3,763.07	0001395	MERCHANT SERVICE MERCH DEP	
03/24/2005 ACH Credit	\$6,971.01	0001283	AMERICAN EXPRESS SETTLEMENT	
03/24/2005 Deposit	\$2,037.00	0031923		
03/24/2005 Deposit	\$29,847.62	0000055	LOCKBOX DEPOSIT	